



September 9, 2024

VIA ECF

The Honorable Rachel Kovner
United States District Court,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *In re QIWI plc Securities Litigation, 1:20-cv-06054 (RPK) (CLP)*

Dear Judge Kovner:

We write on behalf of Lead Plaintiff Moset International Company (“Plaintiff”) in the above-captioned action in response to defendants QIWI plc, Andrey Protopopov, Sergey Solonin, Boris Kim, Alexander Karavaev, Varvara Kiseleva, and Vladislav Poshmorga’s (“Defendants”) Notice of Supplemental Authority. Defendants’ submission of the Second Circuit’s decision in *Boston Ret. Sys. v. Telefonaktiebolaget LM Ericsson*, No. 23-940-cv, 2024 WL 4023842 (2d Cir. Sept. 3, 2024) (“*Boston*”), which affirmed the dismissal of securities fraud claims under §§ 10(b) and 20(a) of the Securities Exchange Act of 1934 as supplemental authority (ECF No. 90) has no impact on this case.

Boston does not impact Plaintiff’s § 10(b) claims because the Second Circuit found the alleged misstatements about government investigations in *Boston* inactionable because they did not encompass the alleged omissions about internal investigations. Here, the alleged misstatements warning of audit and regulatory risks did relate to the alleged omissions about the July 2020 CBR audit and the associated regulatory violations, and otherwise satisfy the applicable pleading requirements. See ¶¶ 183-85, 191-97. Accordingly, the alleged misstatements warning of audit and regulatory violations in this case are actionable.

Respectfully submitted,

/s/ Ivy T. Ngo

Ivy T. Ngo (*pro hac vice*)

FREEDMAN NORMAND FRIEDLAND LLP

1 SE 3rd Ave., Suite 1240

Miami, Florida 33131

Telephone: (786) 924-2900

Emails: ingo@fnf.law

cc: All counsel of record (via ECF).

Freedman Normand Friedland LLP

1 SE 3rd Ave., Suite 1240, Miami, FL 33131

(t) 786.924.2900 (f) 646.392.8842

www.fnf.law